

**CERRO METAL PRODUCTS CO.**

**BELLEFONTE WORKS**  
P. O. BOX 388  
BELLEFONTE, PA 16823

February 09, 1994

Mr. William Steuteville  
On-Scene Coordinator  
United States Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107

Dear Mr. Steuteville,

Cerro Metal Products Company (Cerro) would like to thank you for your time, commitment, and assistance in helping us meet our goal of being an environmentally responsible corporate citizen. Your insight on these matters and your suggestions are appreciated. We also want to thank you for the opportunity to comment on the draft assessment of our site and are doing so by way of this letter.

Cerro comments as follows on the Proposed Actions set forth on pages 14-16 of the Draft Site Evaluation:

- 1) Cerro has developed and is implementing plans to address concerns at SED40 and SED44. The plans address the removal and disposal of contaminated materials from both locations as well as the rerouting of a roof drain and the inactivation, decontamination and sealing of SED40. The plan will also evaluate the piping system for SED44. Cerro intends to complete this work by March 15, 1994 subject to weather conditions and/or permitting processes if any.
- 2) Cerro has conducted and is continuing to implement plans to identify and remediate, as appropriate, areas of its plant with elevated levels of metals and PCBs. Remediation is underway in the Die Cast Area. Subsurface investigation of the Tama-5/melting area is approved and is being implemented. The results from these investigations will provide information to prepare future work plans in this area. This phased approach is being conducted in accordance with the time tables contained in the work plans. Efforts thus far have been directed toward PCB investigation. In order to identify the extent of known contamination from suspected hot spots and or to develop an appropriate soil remediation plan Cerro will conduct additional sampling (including possible statistical sampling). Sampling of the soils is directly weather dependent and will be started as soon as weather permits. Sampling plans will be developed prior to the implementation of said sampling.



- 3) Based on the results of the work outlined in #2, areas that require remediation will be addressed by developing work plans (with time tables) for approval. This is to be done expeditiously.
- 4) Cerro is implementing the approved work plan in the melting area. This investigation is expected to generate data necessary to direct additional investigations and/or remediation work plans, if required. Cerro will consider the feasibility and the practicability of slurry walls as part of an evaluation of remedial options, if necessary and required. Cerro will accomplish this in an expeditious manner.
- 5) Cerro is identifying and accessing all pipes and outfalls from the facility into Logan Branch and will complete this within the EPA time frame. Those not in use will be removed or sealed as appropriate.
- 6) Cerro will review the Resource Applications Report, Facility SPCC plan and amend or update the SPCC plan. This will be completed per EPA suggested schedule.
- 7) Cerro will have biannual testing performed for PCBs levels and metal levels on fish collected by Pennsylvania Fish and Boat Commission. Sediment sampling of Logan Branch will be conducted in a maximum of three sediment deposition zones as agreed to by Cerro and PADER. This will be accomplished within the agreed upon schedule with PADER.
- 8) Based on split samples collected by EPA throughout the facility only two samples possibly were subject to TSCA regulatory standards. The first of these, collected in the middle of the North Yard, underwent removal immediately following receipt of sample results. The second area, generally located by SED40 is being addressed in accordance with EPA proposed schedule in item 1.
- 9) Cerro intends to conduct these response actions in accordance with all applicable Federal, State and Local laws and regulations.
- 10) Cerro will consult with a knowledgeable party on worker health and safety issues. Cerro Metal Products Company is very interested and committed to its employees and has been conducting blood lead level and pulmonary function testing to monitor employees and work place conditions for many years.

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- 11) Cerro intends to work on a voluntary and cooperative basis with PADER, on the stated issues of this Site Evaluations Proposed Actions.

In addition to the foregoing comments on the proposed actions Cerro makes the following comments on the Draft Site Evaluation.

Cerro requests that the cooperative working relationship that existed during your site visits be referenced in the initial paragraph of the draft report.

Cerro cannot comment on the technical accuracy or appropriateness of the sampling performed because we cannot verify whether or not appropriate technical protocols were followed in conducting the sampling or analyzing the samples. We do feel that the sampling locations in many cases were biased/worst case locations.

Because no sampling of the stream bank on the side owned by the railroad was conducted, the sampling effort fails to evaluate other significant potential sources of PCB contamination. Railroads historically have been users of oil containing Arochlor 1248. Also drainage from Route 144 needs to be a consideration.

Under the heading PCB Discharges, you conclude that there are current/ongoing PCB discharges from the site. The sampling conducted showed what existed at the time of the sampling event and nothing else. It is not possible to reach the conclusion stated above based on the data gathered to date.

The report continues with "The Tama 5 area is certainly a source of ongoing PCB discharge". Again, it is not possible to reach such a conclusion based on the data collected, as we advised we have sampled a major outfall from this area and found it to be less than detection on each occurrence. The report should simply note what the samples show.

Under the heading The Cerro Source on page 8 of the report, it is concluded that Cerro is the PCB source. We strenuously object to this conclusion in that it is not possible to so conclude if the existing data and sound scientific principles are applied, and full consideration is given to other potential sources.

On page 9 of the report under Historic Operations vs. Current Operations Source, it is again concluded that PCB's are still being discharged from the Facility. We object to this conclusion.

We feel that it is premature to conclude that an ongoing discharge of metal exists.

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To the extent that the site assessment/site evaluation report becomes part of an administrative record, we request that you include this letter as part of any such administrative record.

Thank you for your cooperation, comments and positive observations. Should you have any questions please contact us.

Sincerely,

Cerro Metal Products Company

A handwritten signature in cursive script, appearing to read "J. Hendrick".

James P. Hendrick  
Vice President  
Engineering & Maintenance

JPH/dks

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